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Attorneys for Plaintiff Hydrafacial LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

HYDRAFACIAL LLC, formerly known as
EDGE SYSTEMS LLC,

Plaintiff,

v.

LUVO MEDICAL TECHNOLOGIES, INC.,
CLARION MEDICAL TECHNOLOGIES,
INC., EUNSUNG GLOBAL CORP., and
HEALTHCARE MARKETS, INC. doing
business as POWERED BY MRP,

Defendants.

**NOTICE REGARDING PLAINTIFF'S
SHORT-FORM MOTION TO COMPEL**

Case No. 2:24-cv-00587-TC-JCB

Judge: Hon. Tena Campbell
Judge: Hon. Jared C. Bennett

Plaintiff HydraFacial LLC (“HydraFacial”) respectfully submits this notice regarding certain disputes briefed in HydraFacial’s short-form discovery motion (“Motion”), Dkt. 74, and addressing Eunsung Global Corp.’s (“Eunsung”) omissions in its opposition to HydraFacial’s Motion, Dkt. 79 (the “Opposition”). The parties have resolved their present disputes regarding Eunsung’s initial disclosures and Eunsung’s interrogatory responses to Interrogatory Nos. 2–4. The parties continue to dispute the sufficiency of Eunsung’s document production pursuant to Judge Campbell’s Patent Rule 4.A.(2) and Eunsung’s response to Interrogatory No. 1.

In its Opposition, Eunsung asserted that Plaintiff filed its motion after Eunsung offered to meet and confer. Dkt. 79 at 2. However, at the time Plaintiff filed its Short Form Motion, Eunsung had only stated: “We are available for a meet and confer on RFP Nos. 6, 10–14, 16, 21, 24, 27, 38, 39, 42, 43, 48–51, 53, 55, 56, 59, and 63 on July 22 and 23.” None of those requests are presently before the Court. It was not until the day after Plaintiff filed its motion that Eunsung offered to meet and confer on any other disputes.

Dated: July 28, 2025

Respectfully submitted,

/s/ Benjamin J. Everton

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CERTIFICATE OF SERVICE

I am a citizen of the United States of America and I am employed in Orange County, California. I am over the age of eighteen years and not a party to the within action. My business address is 600 Anton Boulevard, Suite 1800, Costa Mesa, CA 92626-7653.

On July 28, 2025, I served the foregoing document on counsel shown below via ECF:

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I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 28, 2025, at Costa Mesa, California.



Vanessa Green